

William Bernarduci (WB 5785)  
SCHATZ & NOBEL, P.C.  
One Corporate Center  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Tel.: (860) 493-6292  
Fax: (860) 493-6290

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
RICHARD SALTZMAN, individually and :  
on behalf of all others similarly situated, :  
:  
Plaintiff, :  
:  
v. :  
:  
:  
:  
WORLD INFORMATION :  
TECHNOLOGY, INC., FKA EZ TRAVEL, :  
INC., BECKSTEAD & WATTS, LLP, :  
EDWARD C. ZIMMERMAN, III, GARY :  
D. MORGAN, STEVEN FELLOWS, :  
HSUEH-CHU LIN, JUNG TSIH-HAO, :  
DAN Y. ZHAO, PARSH PATEL :  
Defendants. :  
:  
-----X

**Case No. 04-CV-6195-RMB**

**NOTICE OF MOTION OF  
ZHENGXU HE FOR APPOINTMENT  
OF LEAD PLAINTIFF AND  
APPROVAL OF COUNSEL**

-----X	
ANGELA SOARES, individually and	:
on behalf of all others similarly situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
	:
WORLD INFORMATION	:
TECHNOLOGY, INC., FKA EZ TRAVEL,	:
INC., BECKSTEAD & WATTS, LLP,	:
EDWARD C. ZIMMERMAN, III, GARY	:
D. MORGAN, STEVEN FELLOWS,	:
HSUEH-CHU LIN, JUNG TSIH-HAO,	:
DAN Y. ZHAO, PARSH PATEL	:
Defendants.	:
	:
-----X	

**Case No. 04-CV-7938-UA**

PLEASE TAKE NOTICE that on the Declaration of William Bernarduci dated October 25, 2004, and the exhibits thereto, and on the accompanying memorandum of law, proposed Lead Plaintiff Zhengxu He will move this Court at the United States District Courthouse for the Southern District of New York, 40 Center Street, New York, New York at a date and time to be determined by the Court, for an order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), (i) appointing Mr. He as a Lead Plaintiff in this action on behalf of investors who purchased shares of World Information Technologies, Inc. between January 3, 2003 and March 16, 2004 (the “Class”) and (ii) approving Mr. He’s selection of Schatz & Nobel, P.C. as Lead Counsel.

Dated: October 25, 2004

Respectfully submitted,

**SCHATZ & NOBEL, P.C.**

By: \_\_\_\_\_/s/\_\_\_\_\_  
William Bernarduci (WB 5785)  
One Corporate Center  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Tel.: (860) 493-6292  
Fax: (860) 493-6290

Of Counsel:  
Andrew M. Schatz  
Jeffrey S. Nobel  
Nancy A. Kulesa  
**SCHATZ & NOBEL, P.C.**  
One Corporate Center  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Tel.: (860) 493-6292  
Fax: (860) 493-6290